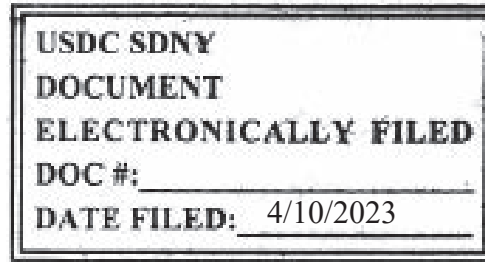




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860.999.9394 INFO@DGPFIRM.COM



April 6, 2023

Hon. Jennifer H. Rearden
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007

RE: Thorsten Busch v. Airbus S.A.S., et al., Case No. 22-CV-06967-ER

Dear Judge Rearden,

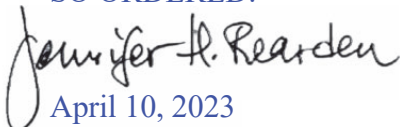
The undersigned represent the Plaintiff Thorsten Busch ("Plaintiff") in the above action. We write to follow up on the Initial Pretrial Conference and to comply with the Court's direction to memorialize our request regarding sequencing of depositions.

Paragraph 10, sub-paragraph d. iii. of the Court's Civil Case Management Plan Contemplates essentially sequenced deposition discovery with non-party depositions following party depositions. Given the complex multi-national nature of this products liability action, Plaintiff would respectfully request relief from this sub-section so that deposition can proceed in an efficient and flexible manner.

Plaintiff has sought and received the assent of the Defendants to this request.

Plaintiff's request on consent to modify the proposed Civil Case Management Plan and Scheduling Order (ECF No. 56) is GRANTED. The Court is in receipt of Defendants' April 4, 2023 email regarding the Hague Evidence Convention discovery processes in Vuksanovich v. Airbus Group HQ, Inc., No. 21-CV-03454. By April 17, 2023, the parties shall file a joint letter describing the anticipated timeline for discovery under the Hague Evidence Convention in the instant matter.

SO ORDERED.


April 10, 2023

Sincerely,

Samuel Kennedy-Smith, Esq.
Stephen Reck, Esq.
Paul Levin, Esq.
617-861-7974
sks@dgpfirm.com
attorneyreck@yahoo.com
plevin1111@aol.com